



APR 28 2021

**Bison Oil & Gas II, LLC**

518 17<sup>th</sup> Street, Suite 1800  
Denver, CO 80202  
Phone: 720-644-6997  
Fax: 303-974-1767

April 22, 2020

U.S. EPA Region 8 Director  
Air and Toxics Technical Enforcement Program  
Office of Enforcement, Compliance and Environmental Justice  
Mail Code 8ENF-AT  
1595 Wynkoop Street  
Denver, CO 80202-1129

RE: NSPS 40 CFR 60 Subpart OOOOa Annual Report – Hunt 8-60 17A

Dear EPA Region 8 Director,

Please find attached the 2020 NSPS OOOOa annual report for the Hunt 8-60-17A production facility per §60.5420a(b). The facility remains owned and operated by Bison Oil & Gas II, LLC. In addition to the annual report, the certification statement, and a copy of the Delegation of Authority Letter for the designated representative are also attached.

Please contact me at [nhoshijo@bisonog.com](mailto:nhoshijo@bisonog.com) or (720) 644-6997 ext. 6-8 if there are any questions.

Sincerely,

Nica Hoshijo, P.E.

EHS Manager  
Bison Oil & Gas II, LLC  
518 17th St., Suite 1800  
Denver, CO 80202  
Office: (720) 644-6997 ext. 6-8  
Cell: (303) 358-9545  
[nhoshijo@bisonog.com](mailto:nhoshijo@bisonog.com)

Attachments: 2020 NSPS OOOOa Annual Report for Hunt 8-60 17A Production Facility  
Certification Statement  
Copy of Delegation of Authority Letter

**40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After Sep**  
**For each affected facility, an owner or operator must include the information specified in paragraphs (b)(1)(i) through (iv) of this section in all annual reports:**

The asterisk (\*) next to each field indicates that the corresponding field is required.

SITE INFORMATION							
Facility Record No. * (Field value will automatically generate if a value is not entered.)	Company Name * (\$60.5420a(b)(1)(i))	Facility Site Name * (\$60.5420a(b)(1)(i))	US Well ID or US Well ID Associated with the Affected Facility, if applicable. * (\$60.5420a(b)(1)(i))	Address of Affected Facility * (\$60.5420a(b)(1)(i))	Address 2	City *	County *
	e.g.: ABC Company	e.g.: XYZ Compressor Station	e.g.: 12-345-67890-12	e.g.: 123 Main Street	e.g.: Suite 100	e.g.: Brooklyn	e.g.: Kings County
Hunt 8-60 17A	Bison Oil & Gas II, LLC	Hunt 8-60 17A		N/A	N/A	Keota	Weld



ALTERNATIVE ADDRESS INFORMATION (IF NO PHYSICAL ADDRESS AVAILABLE FOR SITE *)						REPORTING PERIOD
State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Description of Site Location (\$60.5420a(b)(1)(i))	Latitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (\$60.5420a(b)(1)(ii))	Longitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (\$60.5420a(b)(1)(ii))	Beginning Date of Reporting Period.* (\$60.5420a(b)(1)(iii))
e.g.: NY	e.g.: 11221		e.g.: 7 miles NE of the intersection of Hwy 123 and Hwy 456	e.g.: 34.12345	e.g.: -101.12345	e.g.: 01/01/2016
CO	80729	123-A05A	3.5 miles southwest of Keota	40.663456	-104.123217	1/6/2020

INFORMATION			
PE Certification	ADDITIONAL INFORMATION		
<p>Ending Date of Reporting Period.* (\$60.5420a(b)(1)(iii))</p>	<p>Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. * (\$60.5420a(b)(12)) Please provide only one file per record.</p>	<p>Please enter any additional information.</p>	<p>Enter associated file name reference.</p>
e.g.: 06/30/2016	e.g.: Certification.pdf or XYZCompressorStation.pdf	e.g.: addlinfo.zip or XYZCompressorStation.pdf	
1/5/2021 N/A	N/A	N/A	

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Re  
For each well affected facility, an owner or operator must include the information specified in paragraphs (b)(2)(i) through (ii

The asterisk (\*) next to each field indicates that the corresponding field is required.

			§60.5432a Low Pressure Wells
Facility Record No. * (Select from dropdown list - may need to scroll up )	United States Well Number* (§60.5420a(b)(1)(ii))	Records of deviations where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in § 60.5375a. * (§60.5420a(b)(2)(ii) and §60.5420a(c)(1)(ii))	Please provide the file name that contains the Record of Determination and Supporting Inputs and Calculations * (§60.5420a(b)(2)(iii) and §60.5420a(c)(1)(vii)) Please provide only one file per record.
e.g.: 12-345-67890-12	e.g.: On October 12, 2016, a separator was not onsite for the first 3 hours of the flowback period.	e.g.: lowpressure.pdf or XYZCompressorStation.pdf	

N/A



construction Commenced After September 18, 2015 - 60.5420a(b) Annual Report

i) of this section in all annual reports:

All Well Completions				
Well Completion ID * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(i))	Well Location * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Date of Onset of Flowback Following Hydraulic Fracturing or Refracturing * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Time of Onset of Flowback Following Hydraulic Fracturing or Refracturing * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Date of Each Attempt to Direct Flowback to a Separator * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))
e.g.: Completion ABC	e.g.: 34.12345 latitude, -101.12345 longitude	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 10/16/16

Well Affected Facilities Required to Comply with §60.5375a(a) and §60.5375a(f)

Time of Each Attempt to Direct Flowback to a Separator * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Date of Each Occurrence of Returning to the Initial Flowback Stage * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Time of Each Occurrence of Returning to the Initial Flowback Stage * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Date Well Shut In and Flowback Equipment Permanently Disconnected or the Startup of Production * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Time Well Shut In and Flowback Equipment Permanently Disconnected or the Startup of Production * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Duration of Flowback in Hours * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))
e.g.: 10 a.m.	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 5

Duration of Recovery in Hours * <i>(Not Required for Wells Complying with §60.5375a(f))</i> (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A))	Disposition of Recovery * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)- (B))	Duration of Combustion in Hours * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Duration of Venting in Hours * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)- (B))	Reason for Venting in lieu of Capture or Combustion * (\$60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))
e.g.: 5	e.g.: Used as onsite fuel	e.g.: 5	e.g.: 5	e.g.: No onsite storage or combustion unit was available at the time of completion.



Exceptions Under §60.5375a(a)(3) - Technically Infeasible to Route to the Gas Flow Line or Coll

Well Location * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iv))	Specific Exception Claimed * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iv))	Starting Date for the Period the Well Operated Under the Exception * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iv))	Ending Date for the Period the Well Operated Under the Exception * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iv))	Why the Well Meets the Claimed Exception * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iv))
e.g.: 34.12345 latitude, -101.12345 longitude	e.g.: Technical infeasibility under 60.5375a(a)(3)	e.g.: 10/16/2016	e.g.: 10/18/2016	e.g.: As further described in this report, technical issues prevented the use of the gas for useful purposes.

action System, Re-inject into a Well, Use as an Onsite Fuel Source, or Use for Another Useful Purpose Served By a Purchased Fuel or Raw Material

Name of Nearest Gathering Line * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))	Location of Nearest Gathering Line * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))	Technical Considerations Preventing Routing to this Line * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))	Capture, Reinjection, and Reuse Technologies Considered * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))	Aspects of Gas or Equipment Preventing Use of Recovered Gas as a Fuel Onsite * (\$60.5420a(b)(2)(i) and \$60.5420a(c)(1)(iii)(A)-(B))
e.g.: ABC Line	e.g.: 100 miles away at 34.12345 latitude, -101.12345 longitude	e.g.: right of use	e.g.: on-site generators	e.g.: gas quality

			Well Affected Facility		
Technical Considerations Preventing Use of Recovered Gas for Other Useful Purpose * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Additional Reasons for Technical Infeasibility * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A)-(B))	Well Location* (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Date of Onset of Flowback Following Hydraulic Fracturing or Refracturing * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Time of Onset of Flowback Following Hydraulic Fracturing or Refracturing * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Date Well Shut In and Flowback Equipment Permanently Disconnected or the Startup of Production * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))
e.g. gas quality	e.g. well damage or clean-up	e.g.: 34.12345 latitude, -101.12345 longitude	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 10/16/16



es Meeting the Criteria of §60.5375a(a)(1)(iii)(A) - Not Hydraulically Fractured/Refractured with Liquids or Do Not Generate Condensate, Intermediate Hydrocarbon Liquids, or

Time Well Shut In and Flowback Equipment Permanently Disconnected or the Startup of Production * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Duration of Flowback in Hours * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Duration of Combustion in Hours * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Duration of Venting in Hours * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Reason for Venting in lieu of Capture or Combustion * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(A) and (C))	Does well still meet the conditions of §60.5375a(1)(iii)(A)? * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2))
e.g.: 10 a.m.	e.g.: 5	e.g.: 5	e.g.: 5	e.g: No onsite storage or combustion unit was available at the time of completion.	e.g.: Yes

**Produced Water (No Liquid Collection System or Separator Onsite)**

<p>If applicable Date Well Completion Operation Stopped *</p> <p>((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2) ))</p>	<p>If applicable: Time Well Completion Operation Stopped *</p> <p>((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2) ))</p>	<p>If applicable: Date Separator Installed *</p> <p>((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2) ))</p>	<p>If applicable: Time Separator Installed *</p> <p>((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(2) ))</p>	<p>Are there liquids collection at the well site? Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *</p> <p>((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(iii)(C)(3) ))</p>
e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: 10/16/16	e.g.: 10 a.m.	e.g.: No

Well Affected Facilities Required to Comply with Both §60.5375a(a)(1) and (3) Using a Digital Photo in lieu of Records Required by §60.5420a(c)(1)(i) through (iv)		Well Affected Facilities Meeting the Criteria of §60.5375a(g) - <300 scf of Gas per Stock Tank Barrel of Oil Produced	
Please provide the file name that contains the Digital Photograph with Date Taken and Latitude and Longitude Imbedded (or with Visible GPS), Showing Required Equipment (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(v)) Please provide only one file per record.	Well Location* (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(vi)(B))	Please provide the file name that contains the Record of Analysis Performed to Claim Well Meets §60.5375a(g), Including GOR Values for Established Leases and Data from Wells in the Same Basin and Field * (§60.5420a(b)(2)(i) and §60.5420a(c)(1)(vi)(A)) Please provide only one file per record.	Does the well meet the requirements of §60.5375a(g)? Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. * ((§60.5420a(b)(2)(i) and §60.5420a(c)(1)(vi)(C))
e.g.: completion1.pdf or XYZCompressorStation.pdf	e.g.: 34.12345 latitude, -101.12345 longitude	e.g.: GORcalcs.pdf or XYZCompressorStation.pdf	e.g.: Yes



40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commen  
For each centrifugal compressor affected facility, an owner or operator must include the information specified in paragraphs (b)(3)(i) through (iv) o

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Compressor ID * (\$60.5420a(b)(1)(ii))	For centrifugal compressors using a wet seal system, was the compressor constructed, modified or reconstructed during the reporting period? * (\$60.5420a(b)(3)(i))	Deviations where the centrifugal compressor was not operated in compliance with requirements * (\$60.5420a(b)(3)(ii) and \$60.5420a(c)(2))
e.g.: Comp-12b	e.g.: modified		e.g.: On October 12, 2016, the pilot flame was not functioning on the combustion unit controlling the compressor.

N/A

ced After September 18, 2015 - 60.5420a(b) Annual Report

f this section in all annual reports:

Centrifugal Compressors Required to Comply		
Record of Each Closed Vent System Inspection * (§60.5420a(b)(3)(iii) and §60.5420a(c)(6))	Record of Each Cover Inspection * (§60.5420a(b)(3)(iii) and §60.5420a(c)(7))	If you are subject to the bypass requirements of §60.5416a(a)(4) and you monitor the bypass with a flow indicator, a record of each time the alarm is sounded. * (§60.5420a(b)(3)(iii) and §60.5420a(c)(8))
e.g.: Annual inspection conducted on 12/16/16. No defects observed. No detectable emissions observed.	e.g.: Annual inspection conducted on 12/16/16. No defects observed.	e.g.: On 4/5/17, the bypass alarm sounded for 2 mintues.



with §60.5380a(a)(2) - Cover and Closed Vent System Requirements

If you are subject to the bypass requirements of §60.5416a(a)(4) and you use a secured valve, a record of each monthly inspection. \*  
(§60.5420a(b)(3)(iii) and §60.5420a(c)(8))

If you are subject to the bypass requirements of §60.5416a(a)(4) and you use a lock-and-key valve, a record of each time the key is checked out. \*  
(§60.5420a(b)(3)(iii) and §60.5420a(c)(8))

e.g.: Monthly inspection performed 4/15/17. Valve was maintained in the non-diverting position. Vent stream was not diverted through the bypass.

e.g.: The key was not checked out during the annual reporting period.



	Centrifugal Compressors with Carbon Adsorption		Centrifug:
Record of No Detectable Emissions Monitoring Conducted According to §60.5416a(b) * (§60.5420a(b)(3)(iii) and §60.5420a(c)(9))	Records of the Schedule for Carbon Replacement * (determined by design analysis) (§60.5420a(b)(3)(iii) and §60.5420a(c)(10))	Records of Each Carbon Replacement * (§60.5420a(b)(3)(iii) and §60.5420a(c)(10))	Minimum/Maximum Operating Parameter Value * (§60.5420a(b)(3)(iii) and §60.5420a(c)(11))
e.g.: Annual inspection conducted on 12/16/16. The highest reading using the FID was 300 ppmv.	e.g.: Carbon must be replaced every 2 years.	e.g.: Carbon was not replaced during the annual reporting period.	e.g.: Minimum temperature differential across catalytic oxidizer bed of 20°F.

al Compressors Subject to Control Device Requirements of §60.5412a(a)-(c)

<p>Please provide the file name that contains the Continuous Parameter Monitoring System Data *            (§60.5420a(b)(3)(iii) and §60.5420a(c)(11))            Please provide the file name that contains.</p>	<p>Please provide the file name that contains the Calculated Averages of Continuous Parameter Monitoring System Data *            * (§60.5420a(b)(3)(iii) and §60.5420a(c)(11))            Please provide the file name that contains.</p>	<p>Please provide the file name that contains the Results of All Compliance Calculations *            (§60.5420a(b)(3)(iii) and §60.5420a(c)(11))            Please provide the file name that contains.</p>	<p>Please provide the file name that contains the Results of All Inspections *            (§60.5420a(b)(3)(iii) and §60.5420a(c)(11))            Please provide the file name that contains.</p>	<p>Make of Purchased Device *            (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(i))</p>	<p>Model of Purchased Device *            (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(i))</p>
<p>e.g.: CPMS_Comp-12b.pdf or            XYZCompressorStation.pdf</p>	<p>e.g.: CPMSAvg_Comp-12b.pdf or            XYZCompressorStation.pdf</p>	<p>e.g.: ComplRslts_Comp-12b.pdf or            XYZCompressorStation.pdf</p>	<p>e.g.:            InspectRslts_Comp-12b.pdf or            XYZCompressorStation.pdf</p>	<p>e.g.: Incinerator Guy</p>	<p>e.g.: 400 Combustor</p>



Centrifugal Compressors Using a Wet Seal S

<p>Serial Number of Purchased Device *  (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(i))</p>	<p>Date of Purchase  (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(ii))</p>	<p>Please provide the file name that contains the Copy of Purchase Order (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(iii))  Please provide the file name that contains.</p>	<p>Latitude of Centrifugal Compressor (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) *  (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(iv))</p>	<p>Longitude of Centrifugal Compressor (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) *  (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(iv))</p>
<p>e.g.: 123B3D392</p>	<p>e.g.: 12/10/16</p>	<p>e.g.: purchase_order.pdf  or  XYZCompressorStation.pdf</p>	<p>e.g.: 34.12345</p>	<p>e.g.: -101.12345</p>



ystem Constructed, Modified, or Reconstructed During Reporting Period with Control Device Tested Under §60.5413a(d)

Latitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(iv))	Longitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(iv))	As an Alternative to Latitude and Longitude, please provide the file name that contains the Digital Photograph of Device either with Imbedded Latituded and Longitude or Visible GPS (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(vii)) Please provide the file name that contains.	Inlet Gas Flow Rate * (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(v))	Please provide the file name that contains the Records of Pilot Flame Present at All Times of Operation * (§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(vi)(A)) Please provide the file name that contains.
e.g.: 34.12340	e.g.: -101.12340	e.g.: 400_combustor.pdf or XYZCompressorStation.pdf	e.g.: 3000 scfh	e.g.: pilotflame.pdf or XYZCompressorStation.p df

<p>Please provide the file name that contains the Records of No Visible Emissions Periods Greater Than 1 Minute During Any 15-Minute Period *</p> <p>(§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(vi)(B))</p> <p>Please provide the file name that contains.</p>	<p>Please provide the file name that contains the Records of Maintenance and Repair Log *</p> <p>(§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(vi)(C))</p> <p>Please provide the file name that contains.</p>	<p>Please provide the file name that contains the Records of Visible Emissions Test Following Return to Operation From Maintenance/Repair Activity * ( §60.5420a(b)(3)(iv) and §60.5420a(c)(2)(vi)(D))</p> <p>Please provide the file name that contains.</p>	<p>Please provide the file name that contains the Records of Manufacturer's Written Operating Instructions, Procedures and Maintenance Schedule *</p> <p>(§60.5420a(b)(3)(iv) and §60.5420a(c)(2)(vi)(E))</p> <p>Please provide the file name that contains.</p>
<p>e.g.: noemissions.pdf or XYZCompressorStation.pdf</p>	<p>e.g.: maintainlog.pdf or XYZCompressorStation.pdf</p>	<p>e.g.: emistest.pdf or XYZCompressorStation.pdf</p>	<p>e.g.: manufinsruct.pdf or XYZCompressorStation.pdf</p>



40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual  
 For each reciprocating compressor affected facility, an owner or operator must include the information specified in paragraphs (b)(4)(i) and (ii) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Compressor ID * (§60.5420a(b)(1)(ii))	Are emissions from the rod packing unit being routed to a process through a closed vent system under negative pressure? * (§60.5420a(b)(4)(i))	If emissions are not routed to a process through a closed vent system under negative pressure, what are the cumulative number of hours or months of operation since initial startup or the previous rod packing replacement (whichever is later)? * (§60.5420a(b)(4)(i))	Units of Time Measurement * (§60.5420a(b)(4)(i))	Deviations where the reciprocating compressor was not operated in compliance with requirements* (§60.5420(b)(4)(ii) and §60.5420a(c)(3)(iii))
e.g.: Comp-12b	e.g.: no	e.g.: 2	e.g.: months	e.g.: Rod packing replacement exceeded 36 months. Replacement occurred after 37 months.	

N/A



40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After Se  
For each pneumatic controller affected facility, an owner or operator must include the information specified in paragraphs (b)(5)(i) through (iii) of this section i

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Pneumatic Controller Identification * (§60.5420a(b)(1)(ii), §60.5420a(b)(5)(i), and §60.5390a(b)(2) or §60.5390a(c)(2))	Was the pneumatic controller constructed, modified or reconstructed during the reporting period? * (§60.5420a(b)(5)(i))	Month of Installation, Reconstruction, or Modification* (§60.5420a(b)(5)(i) and §60.5390a(b)(2) or §60.5390a(c)(2))	Year of Installation, Reconstruction, or Modification* (§60.5420a(b)(5)(i) and §60.5390a(b)(2) or §60.5390a(c)(2))
e.g.: Controller 12A	e.g.: modified	e.g.: February	e.g.: 2017	

N/A

September 18, 2015 - 60.5420a(b) Annual Report

in all annual reports:

Pneumatic Controllers with a Natural Gas Bleed Rate Greater than 6 scfh		
Documentation that Use of a Pneumatic Controller with a Natural Gas Bleed Rate Greater than 6 Standard Cubic Feet per Hour is required * (\$60.5420a(b)(5)(ii))	Reasons Why * (\$60.5420a(b)(5)(ii))	Records of deviations where the pneumatic controller was not operated in compliance with requirements* (\$60.5420a(b)(5)(iii) and §60.5420a(c)(4)(v))
e.g.: Controller has a bleed rate of 8 scfh.	e.g.: safety bypass controller requires use of a high-bleed controller	e.g.: Controller was not tagged with month and year of installation.

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction is Required  
For each storage vessel affected facility, an owner or operator must include the information specified in paragraphs (b)(6)(i) through (b)(6)(iv).

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Storage Vessel ID * (\$60.5420a(b)(1)(ii) and \$60.5420a(b)(6)(i))	Was the storage vessel constructed, modified or reconstructed during the reporting period? * (\$60.5420a(b)(6)(i))	Latitude of Storage Vessel (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (\$60.5420a(b)(6)(i))	Longitude of Storage Vessel (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (\$60.5420a(b)(6)(i))
e.g.: Tank 125	e.g.: modified	e.g.: 34.12345	e.g.: -101.12345	

N/A



ction Commenced After September 18, 2015 - 60.5420a(b) Annual Report  
(vii) of this section in all annual reports:

<p>If new affected facility or if returned to service during the reporting period, provide documentation of the VOC emission rate determination according to §60.5365a(e).* (§60.5420a(b)(6)(ii))</p>	<p>Records of deviations where the storage vessel was not operated in compliance with requirements * (§60.5420a(b)(6)(iii) and §60.5420a(c)(5)(iii))</p>	<p>Have you met the requirements specified in §60.5410a(h)(2) and (3)?* (§60.5420a(b)(6)(iv))</p>	<p>Removed from service during the reporting period? * (§60.5420a(b)(6)(v))</p>
<p>e.g.: VOC emission rate is 6.5 tpy. See file rate_determination.pdf for more information.</p>	<p>e.g.: On October 12, 2016, the pilot flame was not functioning on the combustion unit controlling the storage vessel.</p>	<p>e.g.: Yes</p>	<p>e.g.: Yes</p>

			Storage V			
If removed from service, the date removed from service. * (\$60.5420a(b)(6)(v))	Returned to service during the reporting period? * (\$60.5420a(b)(6)(vi))	If returned to service, the date returned to service. * (\$60.5420a(b)(6)(vi))	Make of Purchased Device * (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(A))	Model of Purchased Device * (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(A))	Serial Number of Purchased Device * (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(A))	Date of Purchase * (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(B))
e.g.: 11/15/16	e.g.: Yes	e.g.: 11/15/16	e.g.: Incinerator Guy	e.g.: 400 Combustor	e.g.: 123B3D392	e.g.: 12/10/16

**essels Constructed, Modified, Reconstructed or Returned to Service During Reporting Period that Comply with §60.5395a(a)(2) with a Control Device**

Copy of Purchase Order * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(C))	Latitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(viii) and §60.5420a(c)(5)(vi)(D))	Longitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(viii) and §60.5420a(c)(5)(vi)(D))	Inlet Gas Flow Rate * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(E))	Please provide the file name that contains the Records of Pilot Flame Present at All Times of Operation * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(F)(1 )) Please provide only one file per record.
---	--	--	--	--

e.g.: purchase\_order.pdf  
or  
XYZCompressorStation.p  
df

e.g.: 34.12340

e.g.: -101.12340

e.g.: 3000 scfh

e.g.: pilotflame.pdf or  
XYZCompressorStation.pdf



**Tested Under § 60.5413a(d)**

<p>Please provide the file name that contains the Records of No Visible Emissions Periods Greater Than 1 Minute During Any 15-Minute Period *  (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(F)(2 ))  Please provide only one file per record.</p>	<p>Please provide the file name that contains the Records of Maintenance and Repair Log *  (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(F)(3 ))  Please provide only one file per record.</p>	<p>Please provide the file name that contains the Records of Visible Emissions Test Following Return to Operation From Maintenance/Repair Activity *  (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(F)(4 ))  Please provide only one file per record.</p>	<p>Please provide the file name that contains the Records of Manufacturer's Written Operating Instructions, Procedures and Maintenance Schedule *  (\$60.5420a(b)(6)(vii) and \$60.5420a(c)(5)(vi)(F)(5 ))  Please provide only one file per record.</p>
--	--	---	--

e.g.: noemissions.pdf or  
XYZCompressorStation.pdf

e.g.: maintainlog.pdf or  
XYZCompressorStation.pdf

e.g.: emistest.pdf or  
XYZCompressorStation.pdf

e.g.: manufinsruct.pdf or  
XYZCompressorStation.pdf

**40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September**  
**For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the compan**

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Identification of Each Affected Facility * (\$60.5420a(b)(1))	Date of Survey * (\$60.5420a(b)(7)(i))	Survey Begin Time * (\$60.5420a(b)(7)(ii))	Survey End Time * (\$60.5420a(b)(7)(ii))	Name of Surveyor * (\$60.5420a(b)(7)(iii))	Ambient Temperature During Survey * (\$60.5420a(b)(7)(iv))
	e.g.: Well Site ABC	e.g.: 8/13/17	e.g.: 10:00 am	e.g.: 1:00 pm	e.g.: John Smith	e.g.: 90°F
Hunt 8-60 17A	Hunt 8-60 17A	28-May-20	9:10	9:55	Shannon McKibben	61
Hunt 8-60 17A	Hunt 8-60 17A	28-May-20	9:10	9:55	Shannon McKibben	61
Hunt 8-60 17A	Hunt 8-60 17A	28-May-20	9:10	9:55	Shannon McKibben	61
Hunt 8-60 17A	Hunt 8-60 17A	28-May-20	9:10	9:55	Shannon McKibben	61
Hunt 8-60 17A	Hunt 8-60 17A	16-Sep-20	14:30	15:14	Shannon McKibben	75

18, 2015 - 60.5420a(b) Annual Report

y-defined area, an owner or operator must include the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this s

Sky Conditions During Survey * (\$60.5420a(b)(7)(iv))	Maximum Wind Speed During Survey * (\$60.5420a(b)(7)(iv))	Monitoring Instrument Used * (\$60.5420a(b)(7)(v))	Deviations From Monitoring Plan (If none, state none.) * (\$60.5420a(b)(7)(vi))	Type of Component for which Fugitive Emissions Detected * (\$60.5420a(b)(7)(vii))	Number of Each Component Type for which Fugitive Emissions Detected * (\$60.5420a(b)(7)(vii))
e.g.: Sunny, no clouds	e.g.: 2 mph	e.g.: Company ABC optical gas imaging camera	e.g.: None	e.g.: Valve	e.g.: 3
partly cloudy	6.1	FLIR GasFindIR	None	Intermittent-Bleed Pneumatic	1
partly cloudy	6.1	FLIR GasFindIR	None	Valve	1
partly cloudy	6.1	FLIR GasFindIR	None	Pressure Relief Device	1
partly cloudy	6.1	FLIR GasFindIR	None	Valve	1
Sunny, hazy	7.3	FLIR GasFindIR	None	Intermittent-Bleed Pneumatic	1



ection in all annual reports:

Type of Component Not Repaired as Required in §60.5397a(h) * (\$60.5420a(b)(7)(viii))	Number of Each Component Type Not Repaired as Required in § 60.5397a(h) * (\$60.5420a(b)(7)(viii))	Type of Difficult-to-Monitor Components Monitored *	Number of Each Difficult-to-Monitor Component Type Monitored *	Type of Unsafe-to-Monitor Component Monitored *	Number of Each Unsafe-to-Monitor Component Type Monitored *
e.g.: Valve	e.g.: 1	e.g.: Valve	e.g.: 1	e.g.:Valve	e.g.: 1
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A

Date of Successful Repair of Fugitive Emissions Component * (\$60.5420a(b)(7)(x))	Type of Component Placed on Delay of Repair * (\$60.5420a(b)(7)(xi))	Number of Each Component Type Placed on Delay of Repair * (\$60.5420a(b)(7)(xi))	Explanation for Delay of Repair * (\$60.5420a(b)(7)(xi))	Type of Instrument Used to Resurvey Repaired Components Not Repaired During Original Survey * (\$60.5420a(b)(7)(xii))
e.g.: 11/10/16	e.g.: Valve	e.g.: 1	e.g.: Unsafe to repair until next shutdown	e.g.: Company ABC optical gas imaging camera
28-May-20	N/A	N/A	N/A	N/A
28-May-20	N/A	N/A	N/A	N/A
28-May-20	N/A	N/A	N/A	N/A
28-May-20	N/A	N/A	N/A	N/A
16-Sep-20	N/A	N/A	N/A	N/A

OGI	Compressor Station Affected Facility Only	
Training and Experience of Surveyor * (§60.5420a(b)(7)(iii))	Was a monitoring survey waived under § 60.5397a(g)(5)? * (§60.5420a(b)(7))	If a monitoring survey was waived, the calendar months that make up the quarterly monitoring period for which the monitoring survey was waived. * (§60.5420a(b)(7))

e.g.: Trained thermographer; completed 40-hour course at XYZ Training Center. Has 10 years of experience with OGI surveys.

e.g.: Yes

e.g.: January; February; and March

ITC Optical Gas Imaging I Course (9/27/2018)

N/A

N/A

ITC Optical Gas Imaging I Course (9/27/2018)

N/A

N/A

ITC Optical Gas Imaging I Course (9/27/2018)

N/A

N/A

ITC Optical Gas Imaging I Course (9/27/2018)

N/A

N/A

ITC Optical Gas Imaging I Course (9/27/2018)

N/A

N/A



40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After Septe  
 For each pneumatic pump affected facility, an owner or operator must include the information specified in paragraphs (b)(8)(i) through (iii) of this section in all an

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up)	Identification of Each Pump * (\$60.5420a(b)(1))	Was the pneumatic pump constructed, modified, or reconstructed during the reporting period? * (\$60.5420a(b)(8)(i))	Which condition does the pneumatic pump meet? * (\$60.5420a(b)(8)(i))	If your route emissions to a control device and the control device is designed to achieve <95% emissions reduction, specify the percent emissions reduction. * (\$60.5420a(b)(8)(i)(C))
	e.g.: Pump 12-e-2	e.g.: modified	e.g.: Emissions are routed to a control device or process	e.g.: 90%

N/A

umber 18, 2015 - 60.5420a(b) Annual Report

nual reports:

Pneumatic Pumps Previously Reported that have a Change in Reported Condition During the		
Identification of Each Pump * (\$60.5420a(b)(8)(ii))	Date Previously Reported* (\$60.5420a(b)(8)(ii))	Which condition does the pneumatic pump meet? * (\$60.5420a(b)(8)(ii))
e.g.: Pump 12-e-2	e.g.: 10/15/17	e.g.: Control device/process removed and technically infeasible to route elsewhere

#### Reporting Period

If you now route emissions to a control device and the control device is designed to achieve <95% emissions reduction, specify the percent emissions reduction. \*

(§60.5420a(b)(8)(ii) and §60.5420a(b)(8)(i)(C))

Records of deviations where the pneumatic pump was not operated in compliance with requirements\*

(§60.5420a(b)(8)(iii) and §60.5420a(c)(16)(ii))

e.g.: 90%

e.g.: deviation of the CVS inspections





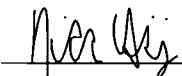
**NSPS 40 CFR 60 Subpart OOOOa – Certification of Truth, Accuracy and Completeness**

The Certifying Official must provide a certification of truth, accuracy, and completeness with regards to annual report submittals under NSPS OOOOa, per §60.5420a(b)(1)(iv). For the attached annual report, I certify that:

“Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”

Name: Nica Hoshijo

Title: EHS Manager

Signature: 

Date: 4/22/2021



**Bison Oil & Gas II, LLC**

518 17<sup>th</sup> Street, Suite 1800  
Denver, CO 80202  
Phone: 720-644-6997  
Fax: 303-974-1767

March 27, 2020

Mr. Gregory Sopkin  
EPA Region 8 Administrator  
U.S. Environmental Protection Agency  
1595 Wynkoop St.  
Denver, CO 80202-1129

**RE: NSPS OOOOa Certifying Official Delegation Notification**

Dear Mr. Sopkin,

This letter is a notification of the delegation of NSPS Certifying Official responsibilities, as required under §60.5430a, for affected facilities operated by Bison Oil & Gas II, llc. As of the date of this letter, the Designated Representative is as follows:

**Certifying Official**

Todd Wolff  
Name

VP Operations  
Title

**Designated Representative**

Nica Hoshijo  
Name

Sr. Staff Environmental Specialist  
Title

Thank you,

Todd Wolff  
VP Operations  
Bison Oil & Gas II, LLC